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10 **UNITED STATES DISTRICT COURT**

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12 **DISTRICT OF NEVADA**

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14 JESSICA SCHENDECK,) CASE NO. 2:22-cv-01348-GMN-NJK
15 vs.) Plaintiff,)
16 PORTFOLIO RECOVERY ASSOCIATES, LLC)) STIPULATION TO EXTEND
17) Defendant.) TIME TO FILE RESPONSE TO
18)) COMPLAINT
19)) (Second Request)

20 Pursuant to Local Rule IA 6-1, Defendant Portfolio Recovery Associates, LLC (“PRA”)
21 by and through its attorney, Philip Lo of Gordon Rees Scully Mansukhani, LLP and Plaintiff
22 Jessica Schedeneck, by and through her attorney Michael Kind of Kind Law, hereby stipulate
23 and agree as follows:

- 24 1. Plaintiff filed her Complaint on August 18, 2022.
25 2. PRA was served with the summons and Complaint on August 22, 2022.
26 3. As such, PRA’s responsive pleading deadline was due on September 12, 2022.
27 4. PRA submitted its first extension request on September 19, 2022.
28 5. The Court granted PRA’s first extension request on September 20, 2022,
extending PRA’s responsive pleading deadline to October 19, 2022. During this time, the parties
have discussed the allegations and claims at issue.

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6. On October 13, 2022, upon PRA's counsel's request, Plaintiff provided a settlement demand. PRA's counsel has communicated this demand to its client, seeking a response. PRA's client contact is out of office from October 17 to 21, 2022.

7. The parties are optimistic that settlement discussions will lead to full resolution of this matter.

8. Accordingly, PRA requests a 14-day extension to file its response to the Complaint, to November 2, 2022.

9. PRA's counsel has communicated with Plaintiff's counsel, and Plaintiff consents to the requested extension.

10. This is PRA's second extension request. Good cause exists, as the parties seek this extension to allow for exploration of early resolution without incurring unnecessary fees and costs.

11. This stipulation is made in good faith and is not intended to inflict unnecessary delay.

12. Pursuant to this Court's local rules, a proposed Order has been attached hereto as Exhibit A.

IT IS SO STIPULATED.

DATED October 18, 2022.

GORDON REES SCULLY MANSUKHANI,
LLP

By: /s/ Philip Lo
Philip Lo
Attorneys for Defendant
Portfolio Recovery Associates, LLC

KIND LAW

IT IS SO ORDERED.
Dated: October 20, 2022


Nancy J. Koppe
United States Magistrate Judge

By: /s/ Michael Kind (with permission)
Michael Kind
Attorneys for Plaintiff